

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No.: 1:14cr306-004 (GBL)
	)	
ALVIN GAITAN BENITEZ,	)	
	)	
Defendant.	)	

**DEFENDANT’S MOTION TO ADOPT CO-DEFENDANT’S MOTIONS**

COMES NOW, the defendant, Alvin Gaitan Benitez, by and through counsel, Amy L. Austin and Jeffrey Daniel Zimmerman, and hereby moves this Honorable Court for leave to join the following motions filed by co-defendants in this case:

1. Motion to Reveal Identity of Confidential Informants (Dkt #328)
2. Motion to Prevent Unauthorized Government Contact (Dkt #327)
3. Motion to Authorize Reasonable Professional Visits (Dkt # 326)
4. Motion for Jencks Material and *Brady/Giglio* Material (Dkt #325)
5. Motion for 404(B) Evidence (Dkt # 324)
6. Motion Regarding Voir Dire and Jury Selection (Dkt #309)
7. Motion for Jury Questionnaire (Dkt # 338)
8. Motion for Discovery/Exculpatory Evidence (Dkt #340)
9. Motion for Disclosure of Rule 404 Evidence (Dkt 346)
10. Motion to Immediately Disclose Any All Contact Between Government Agents or Prosecutors and Potential Jailhouse Informants Incarcerated With Defendant (Dkt #

344), adopted as it specifically pertains to contact with Defendant Alvin Gaitan Benitez

11. Motion To Inspect/Preserve Electronic Mail (Dkt # 332)
12. Motion to Produce Impeachment Evidence as to Hearsay Declarants (Dkt # 333)
13. Motion for a Bill of Particulars (Dkt #336), adopted as it specifically pertains to Defendant Alvin Gaitan Benitez
14. Motion for Index of Recorded Calls (Dkt # 348)
15. Motion for Discovery and Exculpatory Evidence (Dkt # 357)

Defendant reserves his opportunity to join or adopt other motions filed in his case in order to preserve all rights. This motion promotes some measure of judicial economy given the complexity of this case and the number of defendants charged.

Respectfully submitted,

ALVIN GAITAN BENITEZ  
By Counsel

/s/

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/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of July 2015, a true and accurate copy of the foregoing was electronically filed and served via the Court's CM/ECF system to all counsel of record.

\_\_\_\_\_/s/\_\_\_\_\_  
AMY L. AUSTIN